REMARKS

Applicants hereby traverse the outstanding rejections, and request reconsideration and withdrawal in light of the remarks contained herein. Claims 1, 11, and 13 have been amended. Claims 1-31 are pending in this application.

I. Claim Amendments

Claim 1 had been amended to correct a typographical error by adding the word "and." Accordingly, no new matter is presented. Moreover, the correction of this typographical error is not intended to narrow the scope of the claim.

Claim 10 is amended to remove a number types that was objected to by the Examiner. This amendment does not narrow the scope of the claims and is not intended to exclude any type of number from use with the present invention.

Claim 11 had been amended to correct a typographical error by replacing the term "one or elements" with the term "one or more elements." Accordingly, no new matter is presented. Moreover, the correction of this typographical error is not intended to narrow the scope of the claim.

Claim 12 has been amended to correct the subject matter of its dependency from base claim 7 by replacing the term "said one or more numbers" with the term "said one or more elements." Accordingly, no new matter is presented. Moreover, the correction of this error is not intended to narrow the scope of the claim.

II. Claim Rejections Under 35 U.S.C. § 112

The Examiner rejected claim 10 under 35 U.S.C. § 112 because the meaning of the term "duration number" was unclear. Applicants have amended claim 10 to remove this term; however, this amendment is not intended to limit or exclude the operation of the present invention with any number format or type. As a result of this amendment, the rejection under § 112 is moot.

The Examiner rejected claim 12 under 35 U.S.C. § 112 and asserts that the term "elements" as used in claim 12 means "numerical characters" in a text. Applicants have amended claim 12 to correct a typographical error. The term "numbers" in claim 12 has been replaced by the term "elements." Applicants submit that he term elements is not limited meaning "numbers" in view of this correction.

III. Claim Rejections Under 35 U.S.C. § 102

In order for a claim to properly stand rejected under 35 U.S.C. § 102, the cited reference must teach each and every element of the claimed invention. "A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." M.P.E.P. 2131, citing *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631 (Fed. Cir. 1987). "The identical invention must be shown in as complete detail as is contained in the ...claim." M.P.E.P. 2131, citing *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 1236 (Fed. Cir. 1989). Applicants submit that the references cited in the current rejections under § 102 do not teach each and every element of the pending claims.

A. Rejections over *Hyde*

Claims 1-5 and 7 are rejected under 35 U.S.C. § 102 as being anticipated by U.S. Patent No. 6,487,533 to *Hyde* (hereinafter *Hyde*). Applicants traverse the rejection and assert the claims are allowable for the reasons stated below.

Claims 1 and 7 require, in part, "a set of locale-specific rules that define how certain text-based information should be interpreted in the text-to-speech engine," and "accessing a set of locale-specific rules for instructions regarding how to convert said one or more elements to speech," respectively. The Examiner mistakenly asserts that *Hyde* teaches a set of locale-specific rules. Office Action, pages 4-6. Instead, *Hyde* teaches:

> "automatic language identification operations, followed by a text-to-speech conversion performed in accordance with the results of the language identification operations." Col. 3, lns. 1-5.

This is not the same as the claimed limitation.

In order to aid the Examiner in understanding the above distinction, Applicants point out that the locale-specific rules are used to provide a native-like interface to each individual user based not only on language, but also region or country and other factors. Specification, paragraphs [0035] and [0036]. Consequently, a single language may have several locale-specific rules associated therewith, and a single locale-specific rule may be common among several languages. Specification, paragraphs [0041], [0045], [0047], and [0049]. Therefore, language identification, as taught by *Hyde*, is not the same element as a locale-specific rule, as recited in claims 1 and 7. *Hyde* does not teach a locale-specific rule, as required by claims 1 and 7. Accordingly, Applicants respectfully request withdrawal of the 35 U.S.C. § 102 rejection of claim 1 and 7.

Dependent claims 2-5 depend either directly or indirectly from claim 1, and thus inherit all the limitations of that independent claim. Therefore, Applicants respectfully submit that claims 2-5 are allowable, at least, for the reasons discussed above. Accordingly, Applicants respectfully request withdrawal of the 35 U.S.C. § 102 rejection of claims 2-5.

IV. Claim Rejections Under 35 U.S.C. § 103

To establish a prima facie case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art cited must teach or suggest all the claim limitations. See M.P.E.P. § 2143. Without conceding the first or second criteria, Applicants respectfully assert that the references, taken alone or in combination, do not teach or suggest all of the claimed limitations.

A. Rejections over *Hyde* in view of *August*

Claim 6 has been rejected under 35 U.S.C. § 103(a) as being unpatentable over *Hyde* in view of U.S. Patent Application No. 2003/0028378 to *August et al.* (hereinafter *August*). Applicants traverse the rejection and assert that claim 6 is allowable for the reasons stated below.

Claim 1 requires, in part "a set of locale-specific rules that define how certain text-based information should be interpreted in the text-to-speech engine." As noted above, *Hyde* does not teach or suggest a set of locale-specific rules. The Examiner does not rely on *August* as teaching or suggesting a set of locale specific rules, and Applicants assert that *August* does not teach or suggest this limitation. Hence, the combination of *Hyde* and *August* does not teach or suggest every element of claim 1.

Claim 6 depends upon base claim 1, thus inheriting all of its limitations. Therefore, the combination of *Hyde* and *August* does not teach or suggest every element of claim 6 for at least the reasons presented above. Accordingly, Applicants respectfully request withdrawal of the 35 U.S.C. § 103 rejection of claim 6.

B. Rejections over *Hyde* in view of *Hon*

Claims 8, 27, 28, 30, and 31 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over *Hyde* in view of U.S. Patent Application No. 2001/0044724 to *Hon* (hereinafter *Hon*). Applicants traverse the rejection and assert that claims 8, 27, 28, 30, and 31 are allowable, at least, for the reasons stated below.

Claim 7 requires, in part " accessing a set of locale-specific rules for instructions regarding how to convert said one or more elements to speech." As noted above, *Hyde* does not teach or suggest a set of locale-specific rules. The Examiner does not rely on *Hon* as teaching or suggesting a set of locale specific rules, and Applicants assert that *Hon* does not teach or suggest this limitation. Hence, the combination of *Hyde* and *Hon* does not teach or suggest every element of claim 7. Claim 8 depends upon base claim 7, thus inheriting all of its limitations. Therefore, the combination of *Hyde* and *Hon* does not teach or suggest every element of claim 8 for the reasons presented above. Accordingly, Applicants respectfully request withdrawal of the 35 U.S.C. § 103 rejection of claim 8.

Claim 27 requires, in part, " means for accessing a set of locale-specific rules associated with the selected locale; and means for converting the one or more numbers in the text file to speech using the locale-specific rules." As noted above, *Hyde* does not teach or suggest a set of locale-specific rules. The Examiner does not rely on *Hon* as teaching or suggesting a set of locale specific rules, and Applicants assert that *Hon* does not teach or

suggest this limitation. Hence, the combination of *Hyde* and *Hon* does not teach or suggest every element of claim 27. Accordingly, Applicants respectfully request withdrawal of the 35 U.S.C. § 103 rejection of claim 27.

Dependent claims 28, 30, and 31 depend from claim 27, and thus inherit all the limitations of that independent claim. Therefore, Applicants respectfully submit that claims 28, 30, and 31 are allowable, at least, for the reasons discussed above. Accordingly, Applicants respectfully request withdrawal of the 35 U.S.C. § 103 rejection of claims 28, 30, and 31.

C. Rejections over *Hyde* in view of *Hon* in further view of *Flach*

Claims 9, 11, and 12 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over *Hyde* in view of *Hon* and in further view of a IEEE ICASSA 2000 journal article by *Flach et al.* (hereinafter *Flach*). Applicants traverse the rejection and assert that claims 9, 11, and 12 are allowable, at least, for the reasons stated below.

Claim 7 requires, in part "accessing a set of locale-specific rules for instructions regarding how to convert said one or more elements to speech." As noted above, *Hyde* does not teach or suggest a set of locale-specific rules. The Examiner does not rely on *Hon* or *Flach* as teaching or suggesting a set of locale specific rules, and Applicants assert that neither *Hon* nor *Flach* teach or suggest this limitation. Hence, the combination of *Hyde*, *Hon*, and *Flach* does not teach or suggest every element of claim 7. Claims 9, 11, and 12 depend upon base claim 7, thus inheriting all of its limitations. Therefore, the combination of *Hyde*, *Hon*, and *Flach* does not teach or suggest every element of claims 9, 11, and 12, at least, for the reasons presented above. Accordingly, Applicants respectfully request withdrawal of the 35 U.S.C. § 103 rejection of claims 9, 11, and 12.

D. Rejections over *Hyde* in view of *Hon* and *Flach*, and in further view of *Malsheen*

Claim 10 has been rejected under 35 U.S.C. § 103(a) as being unpatentable over *Hyde* in view of *Hon* and *Flach*, and in further view of U.S. Patent No. 5,634,084 to *Malsheen et*

al. (hereinafter *Malsheen*). Applicants traverse the rejection and assert that claim 10 is allowable, at least, for the reasons stated below.

Claim 7 requires, in part "accessing a set of locale-specific rules for instructions regarding how to convert said one or more elements to speech." As noted above, *Hyde* does not teach or suggest a set of locale-specific rules. The Examiner does not rely on *Hon, Flach,* or *Malsheen* as teaching or suggesting a set of locale specific rules, and Applicants assert that neither *Hon, Flach,* nor *Malsheen* teach or suggest this limitation. Hence, the combination of *Hyde, Hon, Flach,* and *Malsheen* does not teach or suggest every element of claim 7. Claim 10 depends indirectly upon base claim 7, thus inheriting all of its limitations. Therefore, the combination of *Hyde, Hon, Flach,* and *Malsheen* does not teach or suggest every element of claim 10, at least, for the reasons presented above. Accordingly, Applicants respectfully request withdrawal of the 35 U.S.C. § 103 rejection of claim 10.

E. Rejections over *Hyde* in view of *Malsheen* and in further view of *Flach*

Claims 13-26 and 29 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over *Hyde* in view of *Malsheen* and in further view of *Flach*. Applicants traverse the rejection and assert that claims 13-19, 26 and 29 are allowable, at least, for the reasons stated below.

Claims 13 and 19 require, in part, "accessing a set of locale-specific rules for the selected locale to determine how to convert the digits to speech," and "accessing a set of locale-specific rules for the selected locale to determine how to format the digits when they are used in the system prompt," respectively. As noted above, *Hyde* does not teach or suggest a set of locale-specific rules. The Examiner does not rely on *Malsheen* or *Flach* as teaching or suggesting a set of locale specific rules, and Applicants assert that neither *Malsheen* nor *Flach* teach or suggest this limitation. Therefore, the combination of *Hyde, Malsheen,* and *Flach* does not teach or suggest every element of claims 13 and 19, at least, for the reasons presented above. Accordingly, Applicants respectfully request withdrawal of the 35 U.S.C. § 103 rejection of claims 13 and 19.

Dependent claims 14-18 and 20-26 depend directly or indirectly from claims 13 and 19, respectively, and thus inherit all the limitations of those independent claims. Therefore,

Applicants respectfully submit that claims 14-18 and 20-26 are allowable, at least, for the reasons discussed above. Accordingly, Applicants respectfully request withdrawal of the 35 U.S.C. § 103 rejection of claims 14-18 and 20-26.

Dependent claims 20-26 and 29 depend directly or indirectly from claim 19, and thus inherit all the limitations of that independent claim. Therefore, Applicants respectfully submit that claims 20-26 and 29 are allowable, at least, for the reasons discussed above. Accordingly, Applicants respectfully request withdrawal of the 35 U.S.C. § 103 rejection of claims 20-26 and 29.
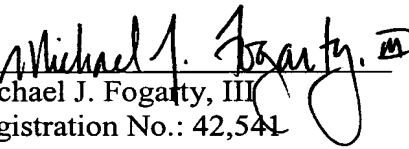
V. Conclusion

In view of the above amendment and remarks, applicants believe the pending application is in condition for allowance.

Applicant believes no fee is due with this response. However, if a fee is due, please charge our Deposit Account No. 06-2380, under Order No. 51410/P028US/10107146 from which the undersigned is authorized to draw.

Dated: April 4, 2005   Respectfully submitted,

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